

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit, No. V-97-044
East Kentucky Power Cooperative Inc.
John Sherman Cooper Power Station
Burnside, Kentucky 42519
December 1, 1997
KOOROSH FARHOUDI

SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATE:

- E. Unit 01: Pulverized coal-fired, dry bottom, wall fired unit equipped with electrostatic precipitator and lo-NO_x burners constructed before 1965.
- E. Unit 02: Pulverized coal-fired, dry bottom, wall fired unit equipped with electrostatic precipitator and lo-NO_x burners constructed before 1969.
- E. Unit 03: Coal handling system includes truck and railcar unloading, receiving hopper, coal conveyers, reclaim hoppers, crusher, coal stacker, coal stock pile, Haul road and yard area constructed before 1970.
- E. Unit 05: Two fly ash silos constructed 1993.

REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on size of emission unit or applicability date of regulation.

Regulations not applicable to Emissions Units 1 and 2 due to applicability date or size of unit:

Regulation 401 KAR 59:015, New indirect heat exchangers, incorporating by reference 40 CFR 60 Subpart D.

Regulation 401 KAR 59:016, New electric utility steam generating units, incorporating by reference 40 CFR 60 Subpart Da.

Regulation 401 KAR 60:042, Standards of performance for industrial- commercial-institutional steam generating units, incorporating by reference 40 CFR 60 subpart Db.

Regulation not applicable to Emissions Unit (03)(Coal Handling) due to affective date of the Regulation.

Regulation 401 KAR 60:250, Standards of performance for coal preparation plants, adopting by reference 40 CFR Subpart Y.

COMMENTS:

- The permittee may assure compliance with sulfur dioxide allowable standards for emissions units 1 and 2 by using sulfur dioxide continuous emission monitoring data.
- The permittee will be required to conduct at least two particulate matter mass emission performance tests for emissions units 1 and 2 to demonstrate compliance with allowable particulate matter mass emission standard within the term of this permit. The permittee may assure continuing compliance with the opacity standard using COM data. The permittee may assure continuing compliance with the particulate matter mass emission standard using the COM data as an indicator as described in the permit. Additional stack testing for particulate matter emissions may be required under circumstances described in the permit.
- This source is subject to acid rain requirements and the Division has issued a Phase II acid rain permit for this facility ; Permit Number: AR-96-19.
- The permittee has not proposed any alternate operating scenario for any of the emissions units.
- This permit does not impose any emission cap on any of the emissions units.
- Emissions Unit 3 , coal handling operations are subject to fugitive emissions Regulation 401 KAR 63:010 and are considered to be in compliance when using control measures required by the regulation.
- Emissions Unit 5, two fly ash silos are subject to Regulation 401 KAR 59:010, New process operations. The permittee may assure compliance with the particulate mass and opacity standards by assuring proper operation of the baghouses. Proper operation of the baghouses can be assured by weekly qualitative observation of stack emissions and in an event of higher opacity observation, determining the opacity of emissions by Reference Method 9 and instigating an inspection of the control equipment for any necessary repairs.
- The permittee shall submit a compliance assurance monitoring (CAM) plan for emissions units 1 and 2 with an application for significant revision of those emissions units or with the application for Title V permit renewal.